

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI**

**In re: Sonya Lynette Moye-Daniels
Debtor**

**CHAPTER 13
CASE NO. 25-01221-JAW**

OBJECTION TO CHAPTER 13 PLAN CONFIRMATION

COMES NOW, First Heritage (“Objector”), a secured creditor herein, and objects to confirmation of the Chapter 13 Plan on the following grounds:

1. Objector holds a claim against the Debtor which is secured by the following: HP Desktop computer; HP desktop computer, 85” Phillips TV; 85” Philips TV; Scag Big Cat Riding Lawn Mower (collectively, the “Property”).
2. The amount owed to Objector is approximately \$9,142.86 plus interest.
3. Debtor’s Chapter 13 Plan fails to include payment on the Property.
4. The amount of the secured claim that should be paid to Objector is approximately \$3,000.00 plus interest.

WHEREFORE, PREMISES CONSIDERED, Objector files its Objection to Chapter 13 Plan Confirmation and prays for a payment on its claim of approximately \$3,000.00 plus interest, and for such other and more general relief as is just.

Respectfully submitted,

**BENNETT LOTTERHOS SULSER
& WILSON, P.A.**

/s/ Charles Frank Fair Barbour

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CERTIFICATE OF SERVICE

I, Charles Frank Fair Barbour, do hereby certify this day that I electronically filed the above and foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Thomas Carl Rollins, Jr. at trollins@therollinsfirm.com

Torri Parker Martin at tpm@tpmartinch13.com

US Trustee at USTPRegion05.AB.ECF@usdoj.gov

And I mailed via US Mail, postage prepaid, a copy to the following:

Sonya Lynette Moye-Daniels
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Terry, MS 39170

/s/ Charles Frank Fair Barbour